

IN THE United States District Court
FOR THE Middle District
Northern Division

RECEIVED

Jimmy Frank Cameron
Plaintiff

2007 FEB 14 A 9:12

JOHN P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

CASE NO. 02-06-CV-1115 MHT

V

Richard Allen ET. AL.
P.H.S Prison Health Service
Doctor Sindig

Motion To Amend
Rebuttal

Come now Jimmy F Cameron in The Above style cause
and Does ASK This Honorable Court on digression Dismiss
Commissioner Richard Allen. if The Court feels He is not Responsible
for ANY of The violations To Plaintiff! Plaintiff further States
Federal Ruks of Procedure 566 To Discharge Their Initial
Burden in seeking summary Judgement, The Defendant. Must!
Geraally do more Than Simply ALledge That Plaintiff has
Failed To Prove his case (see Celotex Corp. v. Catrett 477
US 317-323-324 (1986) I.D. At 328 White. J concurring
Clark v Coats and Clark Inc. 929 F2d 604 608 11 CIR.
1991 Rule 56 E.

Watson v city of memphis 373 U.S. 526, 537 (1963)
it is oviose That vindication of Conceded Constitutional
Rights cannot be made dependant upon ANY Theory That it
is Less expensive To Dewy! Than To Afford Them Jones v.
Johnson 781 F2d 769, 771 9th CIR. 1986. Budegatory Constraints
Do not Justly Cruel and Unusual Punishment

SCANNED

HARRIS V. THIPPIN 941 F2d 1495-1509 11 CIR, 1991

Rejecting Contentions That A States Comparative wealth might effect a Prisoner Right To Constitutionally Adequate medical care. ANKATA V. Prison Health Services INC. 769 F2d 700 705 11 CIR 1985. Lack of funds for facilities cannot Justify unconstitutional Lack of Competent medical care and Treatment for Inmate! Plaintiff HAS A Liver Disease Hepatistis C. AND Doctor siddig know about This Disease and insist on Plaintiffs Taking medication That he is not suppose To Take.

Certificate of Service

I Declare That I have mailed a copy of The foregoing To The Defendant by placing a copy in the u.s. mail This 12 Day of February 2007

Alabama Dept of Correction

Legal Division

PO Box 301501

Montgomery, ALA

36130-1501

2-12-07

105591

Jimmy F Cameron
plaintiff

Jimmy Cameron 105591

PO Box 5707 C1-7A

Union Springs ALA

36089

MONTGOMERY AL 361

13 FEB 2007 PM 1 T



United States District Court

PO Box 711

Montgomery, ALA

36130-2405

36101+0711

